

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NO. 1:20CV66

CARYN DEVINS STRICKLAND,)
)
 Plaintiff,)
)
 vs.)
)
UNITED STATES OF AMERICA, et al.,)
)
 Defendants.)

DEPOSITION

OF

GARY ROBERT ALBRECHT, PhD

Winston-Salem, North Carolina
July 17, 2023
8:59 p.m.

1 Q. Okay. And then what is---

2 A. And this one (indicating).

3 Q. What is the one underneath it?

4 A. This one (indicating)?

5 Q. This one right here (indicating). Sorry.

6 A. This one (indicating)?

7 Q. Yeah.

8 A. That's my notes with Ms. Strickland. You
9 should have that. Yeah, you do.

10 Q. We do have that one. Okay. Great.

11 MR. STRICKLAND: I think just to clarify
12 what they're -- what they're telling you is
13 you have a duty to continue to update your
14 production.

15 THE WITNESS: Oh.

16 MR. STRICKLAND: So if you created
17 something yesterday---

18 THE WITNESS: Yeah, and this, I
19 created and this, I created yesterday.

20 MR. STRICKLAND: ---pursuant to their
21 subpoena, you're going to have to provide
22 them.

23 THE WITNESS: Sure. No problem.

24 Q. All right. So just going over your report
25 one last time because I just want to be clear, in your

1 original report, you said the present value of the
2 difference in expected earnings is 2,949,962. That
3 number is not correct, is that right?

4 A. 2,949,962 is not correct. It is 2,906,243.

5 Q. And is the original tax liability you
6 calculated of \$470,648 also incorrect?

7 A. Yes.

8 Q. And is the original make whole amount you
9 calculated of \$3,420,610 also incorrect?

10 A. Yes. It is 3,373,039.

11 Q. Are the tables in your original report also
12 incorrect?

13 A. Some of them, yes.

14 Q. Which tables---

15 A. Well, I guess they're all incorrect, yeah.

16 Q. So all the tables 1 through 9 are all
17 incorrect?

18 A. Yes.

19 MS. YOUNG: So we object to the fact
20 that the numbers that we were provided are
21 wrong and that the new numbers and new tables
22 that you did were not produced prior to the
23 deposition and were not used in the report
24 and weren't produced in advance under the
25 Rule 45 subpoena. And I think that's all we